OPPOSITION TO PLAINITFF'S MOTION FOR PRELIMINARY INJUNCTION

DECLARATION OF BJORN BJERCKE

I, Bjorn Bjercke, declare:

I am a Norwegian living outside the Norwegian capital city of Oslo, and am over the age of 18. The facts stated in this declaration are within my personal knowledge, except those stated to be on information and belief, and, if called upon, I could and would competently testify to them.

1. My profession is Chief Technology Officer and blockchain specialist at HarmonyChain AS, since 2016. I have been studying blockchain and cryptocurrency from a technical perspective. I studied Math and Computer Science at the University of Denver. I have consulted on bank and trading systems for Danske Bank, Bank2, Orkla Securities, and DNB (Norwegian Bank). I also worked 3.5 year for Dell Computer and am currently serving on the board of ISO certification of standards for Financial Technology "FinTech" in Norway.

- 2. I was contacted on behalf of Onecoin/ OLN in September 2016, for a high paying C-Level position to build a Blockchain from their current SQL database. I explained that blockchains don't work like that, and spent 10-15 minutes explaining the concept of Decentralization to him. A few days later enthusiastic and pushy, he got back to me saying I was the right person for the job and that I would get the agreed pay and many benefits like cars and accommodations if I decide to accept. It wasn't until this call when he reluctantly disclosed it was for Onecoin/ OLN
- 3. Since February 2017 I have been working pro bono with Tim Curry and have done significant research into the functionality of the Onecoin system.

 The functionality of the Onecoin cannot be done in blockchain, but could easily be done in an SQL environment. During different times in my computer analysis and testing, I have even made videos proving definitively that there is no blockchain linked to various Onecoin transactions. With no decentralized blockchain Onecoin cannot be a true "cryptocurrency," as this would be a requirement.
- 4. Onecoin is a centralized system with membership tokens like "miles points" you can acquire for an airline, or like membership points for a chain of

hotels. Also, I would like to add, since Onecoin is a centralized operation, it is essentially minting (or digitally "printing") its own currency at a rate of 1,148,400,000 EUR per 24 hours!

- 5. Onecoin "price" (which is internal only, as it cannot be exchanged whatsoever for any real money, whether fiat or crypto) is said to be a calculation of new members capital joining the network. To add to that the fact that Onecoins are not blockchain based, and therefore not even a cryptocurrency, this is the the text-book definition of a "Ponzi Scheme," which is that new investors money pays out existing investors for a non-existent enterprize.
- 6. In reality the business model is based on nothing more than expensive hype and false marketing, and claiming to be the next bitcoin. It claims it can "process more transactions than Visa and Mastercard combined," calling itself "the future of payments," and also "The Bitcoin Killer," but with zero evidence. A scam.
- 7. Under oath, I have reported my findings regarding Onecoin to Verfahrensintegrierte Finanzermittlugnen Politzei (German Asset Recovery

Police), London City Police Fraud Squad, Okokrim Finansiell Etteretning (Norwegian Economy Police), and other Authorities in Europe and Asia.

- 8. Chris Principe is a promoter of Onecoin and has been viewed on stage at numerous Onecoin Events as evidenced on YouTube. He has also used his magazines, Financial IT and Fin-Future as active promotional material for recruiting people to Onecoin. One Example of this is Fin-Future where he plagiarized material from leaders in the cryptocurrency industry, like the IOTA website, and Global FinTech Influencer, Chris Skinner's blog. I reached out to two of the IOTA guys, David and Dominic, Chris Skinner and Brett King. Their feeling on this were mutual and disgusted by Principe's business ethics to rip them off (without permission).
- 9. Tim Curry has saved millions of potential Onecoin recruits from investing and becoming members of the OneLife MLM "pyramid scam." Curry has posted reams of information online warning people not to join, and why. He has helped lead initiatives towards potential asset recovery for the victims' fund, and assists in setting up victims' support groups where he shares his findings on material that among other info, Chris Principe, is promoting.

- 10. Mr. Curry is considered a hero by his peers in the cryptocurrency community and Onecoin victims alike, for his work on exposing Onecoin fraud.
- 11. In my understanding, the evidence Tim has against Onecoin is so large that Onecoin/ OneLife themselves don't dare file a Legal Suit against Tim Curry, but instead are funding Chris Principe to do so.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed in Baerum, Norway on November 10, 2017